

EXHIBIT A

Kim, Jean

From: DeCarlo, Dan
Sent: Wednesday, November 25, 2020 4:40 PM
To: Bridget Russell; Kiddé, Thomas; Kim, Jean; Shapiro, Peter
Cc: Jill Pietrini; Ted Max; Dylan Price
Subject: RE: Chanel v. WGACA -- Further Deposition Scheduling-

Bridget, as you have seen from our 30b6 notice, **there is a lot to cover and as we previously advised we are not willing to combine two depositions on the same day.** We presume that Chanel will be designating multiple 30b6 witnesses. Ms. Gruber's deposition is particularly important in light of her failure to comply with the Court's order and Chanel's continuing bad faith prosecution of the case which is most acutely evinced by the counterfeiting allegations which have shifted repeatedly including up to today. We will not combine Ms. Gruber's deposition with any other deposition date.

We also find it difficult to believe that Ms. Gruber and Ms. Pietrini or some other lawyer are not available on December 4, but in any event, we are at the end of discovery and so obviously this case should take precedence over other obligations.

We remain willing to depose Ms. Gruber on an available day where other depositions have not been scheduled. The time to reschedule though is now as there are a lot of scheduling issues right now to get everything in before discovery closes. Therefore, we are putting Monday November 30 as the deadline to schedule a new date for Ms. Gruber. If we are not provided with new dates for Ms. Gruber which do not conflict with other depositions, we will proceed with Ms. Gruber as noticed on December 4. Should Ms. Gruber not appear for her duly noticed deposition, then we will seek appropriate relief from the Court.

We are still trying to confirm December 7 regarding Ms. Ritchie.

Regards.

From: Bridget Russell <BRussell@sheppardmullin.com>
Sent: Wednesday, November 25, 2020 4:03 PM
To: DeCarlo, Dan <Dan.DeCarlo@lewisbrisbois.com>; Kiddé, Thomas <Thomas.Kidde@lewisbrisbois.com>; Kim, Jean <Jean.Kim@lewisbrisbois.com>; Shapiro, Peter <Peter.Shapiro@lewisbrisbois.com>
Cc: Jill Pietrini <JPietrini@sheppardmullin.com>; Ted Max <TMax@sheppardmullin.com>; Dylan Price <DPrice@sheppardmullin.com>
Subject: [EXT] FW: Chanel v. WGACA -- Further Deposition Scheduling-

Dear Tom and Dan:

Regarding the issues detailed below:

Ms. Bleys: We do not agree with WGACA's characterization of the facts, but we will draft a stipulation for your review and circulate after the holiday.

Ms. Gruber: **Neither Ms. Gruber nor Ms. Pietrini are available for Ms. Gruber's reopened deposition on December 4, 2020.** They are, however, both available on December 14, 2020. If WGACA does not want to combine the two depositions, Chanel still sees no reason that Ms. Gruber should be forced to appear on a separate day. Counsel can take her reopened 30(b)(1) deposition as to the certification first, and then it can take her 30(b)(6) deposition. As her

30(b)(1) deposition is being reopened for a limited purpose, the timing should not be an issue. Chanel finds it highly unlikely that if forced to decide the issue the Court would order Ms. Gruber to appear for two separate days, when she is willing to sit for both on the same day.

Ms. Ritchie: Please let us know if Ms. Ritchie is available December 7th, 2020.

Certification: We do not expect to have a different certifier.

Thanks,

Bridget

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From: Kiddé, Thomas <Thomas.Kidde@lewisbrisbois.com>

Sent: Friday, November 20, 2020 2:30 PM

To: Bridget Russell <BRussell@sheppardmullin.com>; DeCarlo, Dan <Dan.DeCarlo@lewisbrisbois.com>; Dylan Price <DPrice@sheppardmullin.com>

Cc: Kim, Jean <Jean.Kim@lewisbrisbois.com>; Shapiro, Peter <Peter.Shapiro@lewisbrisbois.com>; Ted Max <TMax@sheppardmullin.com>; Jill Pietrini <JPietrini@sheppardmullin.com>; Shapiro, Peter <Peter.Shapiro@lewisbrisbois.com>

Subject: RE: Chanel v. WGACA -- Further Deposition Scheduling-

All right.

Thank you

T

From: Bridget Russell <BRussell@sheppardmullin.com>

Sent: Friday, November 20, 2020 2:24 PM

To: Kiddé, Thomas <Thomas.Kidde@lewisbrisbois.com>; DeCarlo, Dan <Dan.DeCarlo@lewisbrisbois.com>; Dylan Price <DPrice@sheppardmullin.com>

Cc: Kim, Jean <Jean.Kim@lewisbrisbois.com>; Shapiro, Peter <Peter.Shapiro@lewisbrisbois.com>; Ted Max <TMax@sheppardmullin.com>; Jill Pietrini <JPietrini@sheppardmullin.com>; Shapiro, Peter <Peter.Shapiro@lewisbrisbois.com>

Subject: [EXT] RE: Chanel v. WGACA -- Further Deposition Scheduling-

We are happy to have Ms. Ritchie on December 7th or 11th and can serve an amended notice on Ms. Parker as necessary.

Thanks,

Bridget

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From: Kiddé, Thomas <Thomas.Kidde@lewisbrisbois.com>

Sent: Friday, November 20, 2020 2:20 PM

To: Bridget Russell <BRussell@sheppardmullin.com>; DeCarlo, Dan <Dan.DeCarlo@lewisbrisbois.com>; Dylan Price <DPrice@sheppardmullin.com>

Cc: Kim, Jean <Jean.Kim@lewisbrisbois.com>; Shapiro, Peter <Peter.Shapiro@lewisbrisbois.com>; Ted Max <TMax@sheppardmullin.com>; Jill Pietrini <JPietrini@sheppardmullin.com>; Shapiro, Peter <Peter.Shapiro@lewisbrisbois.com>

Subject: RE: Chanel v. WGACA -- Further Deposition Scheduling-

Bridget:

As the subpoena for Ms. Parker is December 7 as well, when we contact Ms. Ritchie is hers to be the same day or December 11 which was the other potential date you noted?

Thanks
Tom



Thomas S. Kiddé
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From: Bridget Russell <BRussell@sheppardmullin.com>

Sent: Friday, November 20, 2020 2:12 PM

To: DeCarlo, Dan <Dan.DeCarlo@lewisbrisbois.com>; Dylan Price <DPrice@sheppardmullin.com>

Cc: Kim, Jean <Jean.Kim@lewisbrisbois.com>; Shapiro, Peter <Peter.Shapiro@lewisbrisbois.com>; Ted Max <TMax@sheppardmullin.com>; Jill Pietrini <JPietrini@sheppardmullin.com>; Shapiro, Peter <Peter.Shapiro@lewisbrisbois.com>; Kiddé, Thomas <Thomas.Kidde@lewisbrisbois.com>

Subject: [EXT] RE: Chanel v. WGACA -- Further Deposition Scheduling-

Dear Dan,

We will respond to the other points listed in your letter separately. However, in the first instance, please see a deposition notice for a subpoena on Ms. Shannon Parker. We have a good address for Ms. Parker so there is no need to first reach out to her to confirm.

Thanks,

Bridget

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From: DeCarlo, Dan <Dan.DeCarlo@lewisbrisbois.com>

Sent: Friday, November 20, 2020 1:47 PM

To: Bridget Russell <BRussell@sheppardmullin.com>; Dylan Price <DPrice@sheppardmullin.com>

Cc: Kim, Jean <Jean.Kim@lewisbrisbois.com>; Shapiro, Peter <Peter.Shapiro@lewisbrisbois.com>; Ted Max <TMax@sheppardmullin.com>; Jill Pietrini <JPietrini@sheppardmullin.com>; Shapiro, Peter <Peter.Shapiro@lewisbrisbois.com>; Kiddé, Thomas <Thomas.Kidde@lewisbrisbois.com>

Subject: RE: Chanel v. WGACA -- Further Deposition Scheduling-

Bridget:

1. Jennifer Bleys: We would reiterate that this is a problem of Chanel's own making because of its refusal to schedule Ms. Bleys in August well before her baby was due. We wish Ms. Bleys and her new baby well and based on your representations that Ms. Bleys is on family leave and refuses to appear for deposition while on Family Leave, we will look forward to your proposed stipulation to present to Judge Stanton. Please forward a proposed stipulation immediately so we can submit to Judge Stanton for his approval. The stipulation should make clear that the discovery cut off is extended only for WGACA. We would note also, that we scheduled the 30b6 at the end of the cut off for a reason, and not having Ms. Bleys deposed before the 30b6 might prejudice our position. We can revisit that issue after we take Ms. Bleys deposition but we reserve the right to continue with the 30b6 if Ms. Bleys' testimony ends up requiring that we do so. We would propose that we take her deposition January 19, 20 or 21.
2. Robin Gruber: We are not willing to combine her individual deposition with a 30b6 session, even if she does end up being a 30b6 deponent. The 30b6 session will already be complicated enough and we are entitled as the Court ordered, to focus on Ms. Gruber as an individual as it relates to her certification which we did not have the benefit of doing in her first session since she had not yet executed a certification. As such, we will be serving a deposition notice for Ms. Gruber for December 4. That said, if we can coordinate an available date before the cut off that does not conflict with other depositions, we are willing to consider alternate dates. So let us know if there are other dates you would like us to consider.
3. Melanie Ritchie: We will endeavor to respond to you promptly with your request and whether we will be representing her. Please let us know right away if there are other former employees that Chanel wishes to depose.
4. Nidhi Kohli: we will send out a notice for Ms. Kohli for December 10 as you have requested. 7 am PST.
5. Judge Stanton also indicated that we could depose any other officer that Chanel puts forward as a certifier, please confirm that there will be no other officers that will be providing any certifications so that we need not be concerned with scheduling another deposition.

6. Joseph Bravo: We will stick with the deposition as already noticed, namely, November 30, 1 am PST.

Regards.

From: Bridget Russell <BRussell@sheppardmullin.com>

Sent: Friday, November 20, 2020 1:08 PM

To: DeCarlo, Dan <Dan.DeCarlo@lewisbrisbois.com>; Dylan Price <DPrice@sheppardmullin.com>

Cc: Kim, Jean <Jean.Kim@lewisbrisbois.com>; Shapiro, Peter <Peter.Shapiro@lewisbrisbois.com>; Ted Max <TMax@sheppardmullin.com>; Jill Pietrini <JPietrini@sheppardmullin.com>; Shapiro, Peter <Peter.Shapiro@lewisbrisbois.com>; Kiddé, Thomas <Thomas.Kidde@lewisbrisbois.com>

Subject: [EXT] RE: Chanel v. WGACA -- Further Deposition Scheduling-

Dear Dan:

With the intervening Thanksgiving holiday, Ms. Kohli is not available until December 10, 2020.

While we understand you wished to depose Ms. Bleys on that date, Ms. Bleys has had difficulty with her baby, who is not sleeping well, and has asked that she not appear for deposition while she is on her FMLA leave. She will return from maternity leave on January 4, 2021. Please let us know which days in the middle of January you would like for her deposition. Again, Chanel fully appreciates that WGACA is entitled to Ms. Bleys' deposition and will stipulate to extend the discovery cut-off to permit her deposition in January 2021.

As to the Deposition of Ms. Gruber, she will be available to continue her personal deposition regarding Chanel's certification on the same day that she is deposed as Chanel's 30(b)(6) witness – December 14, 2020. We reiterate our request that WGACA serve its Rule 30(b)(6) deposition notice so that we can schedule Chanel's other 30(b)(6) witnesses.

As far as other former employees we would like to depose, we would first like to move forward with Melanie Ritchie on the previously proposed date of December 7, 2020. We believe that you requested that going forward we allow your office to reach out to former WGACA employees to confirm depositions, please let us know if that is still the case and we will forward a subpoena for Ms. Ritchie.

Best,

Bridget

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From: DeCarlo, Dan <Dan.DeCarlo@lewisbrisbois.com>

Sent: Thursday, November 19, 2020 4:12 PM

To: Dylan Price <DPrice@sheppardmullin.com>; Bridget Russell <BRussell@sheppardmullin.com>

Cc: Kim, Jean <Jean.Kim@lewisbrisbois.com>; Shapiro, Peter <Peter.Shapiro@lewisbrisbois.com>; Ted Max <TMax@sheppardmullin.com>; Jill Pietrini <JPietrini@sheppardmullin.com>; Shapiro, Peter

<Peter.Shapiro@lewisbrisbois.com>; Kiddé, Thomas <Thomas.Kidde@lewisbrisbois.com>

Subject: RE: Chanel v. WGACA -- Further Deposition Scheduling-

Ok, Tony Rago on December 1. Is that 7 a.m PST 10 EST?

Can you confirm Robin Gruber for December 4th and Nidhi Kohli for NOvember 24th?

As for Mr. Bravo- let me get back to you with an alternative date, but for now lets keep the 30th in case we can't get an alternate date.

Let me know if there are any other scheduling issues.

Thanks.

From: Dylan Price <DPrice@sheppardmullin.com>

Sent: Thursday, November 19, 2020 3:06 PM

To: DeCarlo, Dan <Dan.DeCarlo@lewisbrisbois.com>; Bridget Russell <BRussell@sheppardmullin.com>

Cc: Kim, Jean <Jean.Kim@lewisbrisbois.com>; Shapiro, Peter <Peter.Shapiro@lewisbrisbois.com>; Ted Max

<TMax@sheppardmullin.com>; Jill Pietrini <JPietrini@sheppardmullin.com>; Shapiro, Peter

<Peter.Shapiro@lewisbrisbois.com>; Kiddé, Thomas <Thomas.Kidde@lewisbrisbois.com>

Subject: [EXT] RE: Chanel v. WGACA -- Further Deposition Scheduling-

External Email

Hi Dan,

Tony Rago is available on December 1, so we are going to notice him for that date. Joseph Bravo has already been set for November 30.

Dylan

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From: DeCarlo, Dan <Dan.DeCarlo@lewisbrisbois.com>

Sent: Thursday, November 19, 2020 2:59 PM

To: Bridget Russell <BRussell@sheppardmullin.com>

Cc: Kim, Jean <Jean.Kim@lewisbrisbois.com>; Shapiro, Peter <Peter.Shapiro@lewisbrisbois.com>; Ted Max

<TMax@sheppardmullin.com>; Jill Pietrini <JPietrini@sheppardmullin.com>; Dylan Price

<DPrice@sheppardmullin.com>; Shapiro, Peter <Peter.Shapiro@lewisbrisbois.com>; Kiddé, Thomas

<Thomas.Kidde@lewisbrisbois.com>

Subject: RE: Chanel v. WGACA -- Further Deposition Scheduling-

Please note the below deposition scheduling and proposed scheduling. We think, this is a comprehensive list. Please correct any errors. Your prompt attention to these scheduling matters is appreciated.

We would like to propose:

1. NIDHI KOHLI: As noted below, we took Ms. Kohli's deposition off calendar on 11-23 and would now like to propose **NOVEMBER 24 AT 7 AM PST.**
2. JOSEPH BRAVO: Mr. Bravo has been noticed for November 30, 1 am PST. We would like to move Mr. Bravo to **December 1 at 1 am PST.**
3. ROBIN GRUBER: We would like to set Ms. Gruber for **December 4, 7 am PST.**

Please get back to us as soon as possible on these proposed dates.

As a reminder, we had already confirmed the following dates as well:

1. JENNIFER BLEYS: December 10, 7 am PST
2. CHANEL'S 30B6: December 14, 7 am PST (we are still working on the formal notice but will issue it shortly).
3. Ambria Mische: December 3, 7 am PST.
4. Sun Li: December 2, 4 pm PST.
5. WGACA's 30b6 December 8, 7 PST.

Still to be scheduled include:

1. Tony Rago
2. Chanel's identification of two as yet unidentified 3rd party witnesses.

We look forward to your prompt response to the above.

Regards.

From: DeCarlo, Dan

Sent: Thursday, November 19, 2020 10:36 AM

To: Bridget Russell <BRussell@sheppardmullin.com>

Cc: Kim, Jean <Jean.Kim@lewisbrisbois.com>; Shapiro, Peter <Peter.Shapiro@lewisbrisbois.com>; Ted Max <TMax@sheppardmullin.com>; Jill Pietrini <JPietrini@sheppardmullin.com>; Dylan Price <DPrice@sheppardmullin.com>; Shapiro, Peter <Peter.Shapiro@lewisbrisbois.com>; Kiddé, Thomas <Thomas.Kidde@lewisbrisbois.com>

Subject: RE: Chanel v. WGACA -- Deposition Scheduling- Marianna Nitsch off calendar

Counsel, it appears we will need to coordinate further deposition scheduling:

1. TONY RAGO: We acknowledge the cancellation of Tony Rago's deposition which will be rescheduled we understand. Please check with us before committing to a date.
2. MARIANNA NITSCH: Please be advised we are taking OFF CALENDAR, Marianna Nitsch's deposition.
3. NIDHI KOHLI: We still need to reschedule Nidhi Kohli's deposition which we will endeavor to do very soon. If there are days in which she can't sit for a deposition in the next two weeks, please let us know.
4. ROBIN GRUBER: **We need to schedule another session of Robin Gruber's deposition**, so please advise us what days she is not available the next two weeks.

Thank you.

From: DeCarlo, Dan

Sent: Wednesday, November 18, 2020 11:03 AM

To: Bridget Russell <BRussell@sheppardmullin.com>; Kiddé, Thomas <Thomas.Kidde@lewisbrisbois.com>
Cc: Kim, Jean <Jean.Kim@lewisbrisbois.com>; Shapiro, Peter <Peter.Shapiro@lewisbrisbois.com>; Ted Max
<TMax@sheppardmullin.com>; Jill Pietrini <JPietrini@sheppardmullin.com>; Dylan Price
<DPrice@sheppardmullin.com>; Shapiro, Peter <Peter.Shapiro@lewisbrisbois.com>
Subject: RE: Chanel v. WGACA -- Reschedule Deposition of Nidhi Kohli

We will need to reschedule the deposition of Nidhi Kohli. She was scheduled for November 23. We will reschedule that deposition. The deposition will not go forward on November 23.

Regards.



Dan C. DeCarlo

Partner

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